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DETTA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

**FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

UNITED STATE OF AMERICA, )  
)  
)  
)  
vs. )  
)  
DARRYL ANDRE KENNEDY, )  
)  
Defendant. )

CASE NUMBER: 2:06-cr-00285-WKW.

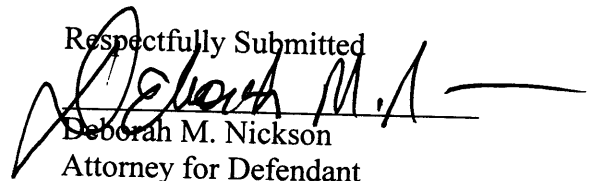
**MOTION TO DISCOVER CRIMINAL RECORDS OF WITNESSES**

Comes now Darryl Andre Kennedy, defendant by and through his attorney, and moves this Court to require the United States Attorney to make available to Defendant's attorney any and all criminal records which any of the Government's witnesses or possible witnesses may have in this cause and, in support of such Motion, would show the Court that if there is information which the government has reflecting that any witnesses they may call are guilty of criminal acts and/or acts of misconduct, this testimony could be used by the Defendant for impeachment purposes, or to show the interest and bias of the witness. Thus, if the government does not reveal this to the Defendant, the government will be secreting evidence, which could alter the verdict in such cause.

WHEREFORE, PREMISES CONSIDERED, the Defendant moves the Court to require the Government to reveal any criminal record or act of misconduct that any witness they will call or may call has in this case.

Dated: 02/14/07

Respectfully Submitted



Deborah M. Nickson

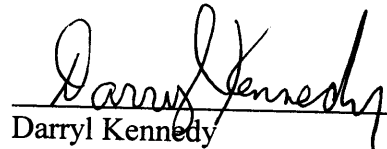
Attorney for Defendant

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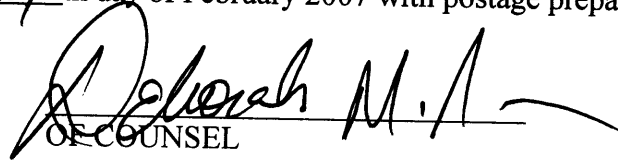


Darryl Kennedy

Defendant

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that I have served a copy of the foregoing Motion to Discover Criminal Records of Witnesses is served upon all Attorneys of record, by placing a copy of the same in the United States Mail, this the 14 th day of February 2007 with postage prepaid and envelope properly addressed.

  
OF COUNSEL

Attorney for Defendant

DOJ-USA OFFICE  
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